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AUTHOR Clymer-Spradling, Carol
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ABSTRACT

A discussion of issues related to accountability in adult English-as-a-Second-Language (ESL) programs looks at ways in which current quality and accountability measures address the real issues of adult immigrant education. First, the strengths and weaknesses of accountability schema that have been developed in other education contexts are examined, and the "state of the art" of quality for adult ESL instruction is defined. Components necessary to an accountability system suitable for this context are then delineated. The status of federal and state efforts to establish accountability systems for adult ESL education is assessed, and gaps in the present systems are identified. Finally, recommendations are made for public (state and federal) policy formation and development of appropriate models of accountability. Contains 31 references. (MSE) (Adjunct ERIC Clearinghouse on Literacy Education)

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by
Carol Clymer-Spradling

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Background Paper Prepared for

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by

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FOREWORD

This paper is one of several prepared by consultants to The Project on Adult English as a Second Language (ESL) of the Southport Institute for Policy Analysis. These papers were commissioned to help the Project's staff develop an in-depth understanding of various issues and perspectives bearing on the present state and future directions of ESL service in the United States.

This and the other papers commissioned were prepared in 1993. The consultants who prepared them met as a group three times during that year and vigorously debated each other's work as well as other issues concerning ESL. At no time during this process did the Project's staff require that the consultants agree with each other or with the conclusions being formulated by the staff. The consultants were given complete freedom to state their own ideas.

As a result, the views expressed in this paper are those of the author alone. They do not necessarily reflect the views of the Southport Institute, the Project on ESL any of the other consultants involved with the Project on ESL.

The Southport Institute is making these working papers available to help increase understanding and stimulate discussion about the problems of adult literacy and as an expression of gratitude for the contribution of the authors to the Project on ESL.

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Carol Clymer-Spradling:	Quality, Standards and Accountability in ESL Programs
JoAnn (Jodi) Crandall:	Improving the Quality of Adult ESL Programs: Building the Nation's Capacity to Meet the Educational and Occupational Needs of Adults with Limited English Proficiency
Inaam Mansoor:	The Use of Technology in Adult ESL Programs: Current Practice - Future Promise
Barbara Prete:	Evolution of ESL Policy in New York City
Gail Weinstein-Shr:	Restoring the Intergenerational Cycle of Family Teaching: Family Literacy In Multilingual Communities
Terrence G. Wiley:	Access, Participation, and Transition in Adult ESL: Implications for Policy and Practice

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Quality, Standards and Accountability in ESL Programs

by
Carol Clymer-Spradling

Introduction

The words quality, standards and accountability are hard to avoid in any discussion of adult ESL today. Stakeholders: administrative and instructional staff, learners, funders and the community, including the business community, want to know what they are getting for their investments. Thus, program administrators are being asked to reveal what they are trying to achieve, how good of a job they are doing and how they can prove it. These are not unreasonable requests, but program people at all levels of implementation are finding it difficult to determine what constitutes quality, what are acceptable standards of performance, and what is required to demonstrate accountability for adult ESL instruction.

Difficulty stems from the nature of adult education in general, how it is funded, and the tendency to gloss over the real issues of teaching adult immigrants English.

Nevertheless, the National Literacy Act of 1991 requires that state and local programs receiving funds from the Adult Education Act (AEA) will establish indicators of program quality to help judge the success of adult education. A preliminary examination of the efforts of the federal and state governments in carrying out the requirements of the National Literacy Act bears the news that while all states and the federal government have submitted indicators of program quality, progress in using them to demonstrate accountability is slow and efforts to establish standards of success are minimal. The purpose of this paper is to take a look at exactly what has been accomplished by the states, why it has been so difficult and what policy recommendations can be made to establish serious systems of accountability.

Adult education encompasses a spectrum of services designed to improve the acquisition of language, literacy and basic skills for adults who have not had the opportunity to develop such skills previously. This publication focuses specifically on issues that relate to ESL learners because it is an area of adult education that is frequently overlooked, forgotten or not deemed to be a priority by the field and funders (Wrigley & Guth, 1992). Specifically, the Southport Institute for Policy Analysis estimates that there are 11 to 14 million adults who are limited in their English proficiency and may be in need of second language education. Of those, only about 1.2 million students are served in adult basic education services at a cost of about 64 million dollars (Chisman, Wrigley, and Ewen, 1993). Obviously, the little funding that is available for this population must be used as prudently and effectively as possible.

This is not to say that no steps have been taken to demonstrate accountability in adult education. The National Literacy Act of 1991, legislated that adult education programs funded under the Adult Education Act identify indicators of quality that would be used to demonstrate success. For almost two years, the federal government and the states have been involved in an effort to define quality in adult education.

Thus far, the federal government and the states have all developed documents which outline quality indicators. Indicators have been developed with varying degrees of input from the field (Center on Budget and Policy Priorities, 1993) and varying degrees of enthusiasm. While some reactions to this requirement can best be summarized with the expression "it's about time," others feel that the requirement is unfair given that other postsecondary institutions such as community colleges and universities are not legislated to demonstrate outcomes or successes, yet they receive far more than 128 million dollars of federal funds. Still others are concerned about how the indicators will be used, and even though performance standards are not required by law, practitioners are anxious about the possibility of developing performance standards for programs that serve such diverse populations (The Literacy Assistance Center, 1992).

Bob Shireman, a legislative aide to Senator Paul Simon of Illinois, one of the authors of the original legislation of the National Literacy Act, argues that program performance standards are needed to keep funding honest and keep politics out of funding decisions ("Shireman: Program Performance," 1993). But others approach the process with caution, citing concern for: (1) the lack of adequate resources to implement quality

programs and meet performance standards, (2) the inappropriateness of measures to determine if performance standards have been met, and (3) the identification of inappropriate standards for the population that is served ("Shireman: Program Performance," 1993).

Regardless of the feelings that permeate this movement, all states met the requirement of submitting indicators to the U.S. Department of Education (USDOE) in July of 1993 and many are in the process of refining or expanding their documents. In addition, the National Institute for Literacy (NIL) recently completed a Request for Proposals process "to help state and local leaders create performance measurement, reporting and improvement systems that will enhance states' abilities to monitor the results of their adult literacy systems and to make continuous improvements in their literacy programs and policies" (Federal Register, 1993, p. 41940). Unfortunately, only five states are funded to create systems, with only two having significant ESL populations (New York and Hawaii).

There are five major problems, however, in what has been accomplished to date. The problems are:

1) The indicators of quality that have been established are inconsistent across states and are not comprehensively reflective of what constitutes quality in adult education.

2) The federal government and the states have avoided identifying what they are exactly trying to achieve in programs and specific learner outcomes have been left unstated.

3) There is little indication of what type of evaluation should accompany the review of indicators, little discussion of what constitutes quality evaluation in adult education, and little attempt to evaluate the quality indicators that have been developed to date.

4) There is even less attention to the systems of monitoring and compliance that will be utilized to see if programs reflect the established indicators of quality and almost no indication of what will happen to programs if they do not demonstrate accountability.

5) Minimal attention is paid to ESL instruction in the work that has been done so far.

In short, the efforts of the federal government, the states and the NIL do not separately or collectively provide the necessary leadership to unite adult educators to thoroughly study the issue of accountability; to assess what needs to be done about it so that programs can demonstrate that they are making a difference and getting the most "bang for the buck;" and to mobilize the field so that local, state and federal efforts are organized to accomplish the awesome task of developing quality programs that meet standards and demonstrate accountability.

To overcome these problems it is necessary to: (1) examine the strengths and weaknesses of accountability schema that have been developed in other educational settings, (2) define what is "state of the art" in terms of quality for adult ESL, (3) describe the components of a system for accountability that would be appropriate for adult ESL programs, (4) assess the status of federal and state initiatives in establishing systems of accountability for adult ESL education to date, (5) identify gaps in the present accountability systems that have been developed for adult ESL programs and (6) make recommendations for policy makers that will enable federal and state governments and local providers to develop appropriate models of accountability for adult ESL programs.

Accountability Schema: What We Know About Other Programs

Accountability is a concept which involves determining the effects of educational programs and institutions by examining the outcomes in relation to the use of resources (Dressel, 1978). Various stakeholders such as administrative and instructional staff, learners, funders and the community, including the business community, are interested in how educational programs demonstrate accountability. While many feel that accountability has never been more important to the institution of education than today, it is both a pervasive and elusive concept that is difficult to realize because inherent in accountability is defining what constitutes quality and standards.

Quality is an overarching goal of programs that is difficult to define but often recognized when observed. Key to the notion of quality is the idea that program

providers have common elements that exist in good programs, some essential components, and ways to measure the quality that is evidenced in the essential components.

Bogue and Saunders (1992) see quality as "conformance to mission specifications and goal achievement-within publicly accepted standards of accountability and integrity" (p. 20). They further suggest that while measuring quality is complicated, it must involve:

1. selecting evidences and indicators of performance,
2. acquiring and analyzing data,
3. setting an appropriate standard of performance,
4. identifying who will make the judgments of performance and how. (p.17)

Establishing standards involves defining what quality is and setting the parameters of what makes a program effective or ineffective. Ideally, standards are based on concrete data or information about what works and what does not work and what has been achieved or not achieved. Important to the development of standards is the identification of performance measurement, or some yardstick which enables program providers to determine how well they have met or reached a standard. There are three possible choices for developing standards according to Bogue and Saunders (1992, p. 5):

1. A criterion standard in which performance is compared to a predetermined criterion level.
2. A normative or comparative standard, in which performance is judged against the performance of another program, person or group of persons.
3. A connoisseuring standard in which performance is judged against the opinions and values of a panel of judges.

Quality, standards and accountability are interrelated - one cannot exist without the other. Ideally, they function synchronously to produce programs that meet the needs and goals of learners as efficiently and effectively as possible. In essence, accountability is the ultimate outcome of a quality program that is able to demonstrate that standards have been met through systems which measure program and learner outcomes. But even though quality, standards and accountability are on the agendas of many educational programs and legislation exists to require most programs that receive federal and state dollars to develop accountability systems, no area of education has been able to construct an adequate approach.

There are several significant reasons why it is so difficult to create accountability systems. First, substantial resources are required to develop appropriate accountability systems. Because of inadequate funding for education in general, most educational resources are required for serving students. This problem is severe for adult education since it is grossly underfunded in comparison to primary, secondary, higher and vocational education and employment training programs. Under Adult Basic Education

grant approximately, 95% of the adult education resources are earmarked for serving students leaving only 5% for administration. Therefore, most adult education programs cannot afford to set up systems of accountability.

Second, while quality might be recognizable when it is observed, the process of establishing standards and systems of measurement is a "thorny" issue for educators, especially adult ESL educators. Difficult questions emerge such as can performance standards truly reflect program quality when quality is so difficult to define; can program standards be developed to examine the performance of diverse adult populations who come to educational programs with a variety of needs, backgrounds and experience; and what are the most important outcomes for programs and students and can those outcomes be accurately measured given the inadequacy of existing assessment tools. These questions, and a myriad of others, must be addressed as part of the process of establishing accountability.

Third, there is a tension between product and process in measuring the outcomes of education. On the one hand, a movement to establish national standards that are measured with national tests is prevalent throughout education (see Bogue & Saunders 1992; National Council on Education Standards and Testing, 1992). The view that the results of education can be quantified and measured according to a "one size fits all" system is contrary to the emerging educational theories that promote emancipatory practice, participatory learning and holistic instruction (see Fingeret & Jurmo, 1989; Kerfoot, 1993; Wrigley and Guth, 1992).

Finally, for adult education, the challenge of establishing systems of accountability is especially overwhelming given the status of a workforce that is largely part-time and not part of an organized profession of adult educators. In order to create and implement systems of accountability, large scale professional development is required.

Nevertheless, the requirement to demonstrate accountability in adult education is real. Responding thoughtfully and carefully is crucial. Further, examining the approaches to accountability of other educational areas can help adult educators avoid unnecessary pitfalls.

Programs which receive funding from the Carl D. Perkins Vocational and Applied Technology Education Act of 1990 have been mandated through legislation to measure student gains in academic skills, and occupational performance (Section 115(a) and (b). In addition, this legislation, encourages states to serve special populations effectively (Section 118(a). Accordingly, each state must develop performance standards that measure: 1) learning gains, 2) competency or job skill attainment, 3) placement into employment or other training programs, and 4) retention in or completion of secondary school or its equivalent (Condelli & Kutner, 1992).

Technical assistance for Carl Perkins funded programs to meet the regulations is provided through the National Center for Research In Vocational Education (NCRVE). The Center advocates an outcomes assessment approach to accountability which relies greatly on the collection of information for improving the program and determining the impact of institutional and program efforts on student achievement (NCRVE, 1992).

This approach is seen as critical to providing quality programs for dealing with the diversity of students in postsecondary programs. Specific recommendations for developing an outcomes assessment system according to Bragg and Harmon (1992), are:

1. Focused and realistic **mission statement and goals** should be tied to outcomes assessment and institutional effectiveness processes.
2. Issues of **cultural diversity and pluralism** should be adequately addressed in the system.
3. The system should reflect **top down support and bottom up development** coupled with adequate resources.
4. The **needs of the customer** should be considered a top priority.
5. Existing information should be audited and used to learn about how the internal and external processes of an organization are functioning, **reinforced by and coordinated with essential data collection** activities.
6. **Longitudinal databases using qualitative and quantitative data on student performance** should be created.
7. Evaluation and assessment information should be used for **improving and planning programs.**

In addition, Hoachlander (1991) suggests that a good accountability system includes a clearly defined system of measures and standards, which is manageable and based on accurate, timely and uncomplicated data collection.

The approach to establish accountability systems taken by vocational education through the work of NCRVE is valuable in terms of the emphasis on setting standards that are based on viable data collection and developing systems of data collection that provide useful information for program planning and improvement. The need to strike a balance between spending time to create effective programs and demonstrating that they are effective is supported as well. Valuable technical assistance through NCRVE is apparent. But vocational education's overall approach is weak in terms of monitoring components and systems for defining quality in vocational education programs.

While the original intent of the Job Training Partnership Act (JTPA) was to allocate funds to provide training and jobs for disadvantaged adults and out of school youth, the actual implementation of job training for this population required education to build basic skills needed for training and employment. Since its inception, the JTPA program has required programs to identify standards which specify acceptable levels of performance and indicators of program quality. Legislation requires that programs measure employment, earnings and reduction of welfare dependency for participants. There are four core performance standards adopted by the U.S. Department of Labor (USDOL) for JTPA, Title IIA programs:

1. employment rate at follow-up
2. weekly earnings at follow-up
3. youth entered employment rate
4. youth employability rate

Follow-up occurs three months after program termination and numeric goals for the performance measures to monitor program outcomes in each state are set by the USDOL. These outcomes may be adjusted according to state and local conditions. More funding may be obtained when providers exceed standards; and all providers must have a management information system for keeping data related to standards, demographics, fiscal matters and other program requirements.

Performance standards for JTPA 123 funds, which are typically awarded to serve high risk populations, like language minority students, must demonstrate educational gains in specified time periods that are determined locally.

While JTPA was one of the first programs to establish performance standards, its approach was based on setting standards without much regard to the process issues involved in establishing quality programs. The need to develop performance standards that are based on systematic qualitative and quantitative data collection and research is an important lesson to learn regarding the shortcomings of the JTPA approach to accountability. A specific lesson learned from JTPA regarding performance standards is that they have the potential for operationalizing the law of unintended consequences and reducing the level of services without revealing much about quality (see Condelli & Kutner, 1992; Stein, 1993).

Another federal program which recently announced the requirement of performance standards is the Job Opportunities and Basic Skills Training (JOBS) Program of the U.S. Department of Health and Human Services (USDHS). The U.S. Department

of Health and Human Services will issue a first on a series of reports on developing performance criteria for the program, but essentially, the Department did not meet the October 1993 deadline for completion of program standards. The Department is experiencing difficulty in establishing the standards because of the many variables that affect the JOBS program that cannot be controlled such as the economic condition of the community, the mandatory requirements of the program, and the resistance issues related to avoiding participation (Texas Department of Human Services, 1993).

Leadership for establishing systems of accountability and standards of program quality for community based programs has also been initiated by the Association for Community Based Education (ACBE). Work by Sondra Stein (1993) provides a framework for assessing program quality which encourages programs to:

1. define program goals in relation to community needs;
2. define outcomes that operationalize these goals;
3. describe outcomes concretely and comprehensively to facilitate measurement;
4. identify structures and processes the program needs to have in place for the outcomes to be achieved;
5. develop systems of documentation that will enable the programs to measure change along key parameters. (p.2)

While the ACBE framework is strong in terms of balancing product and process, it falls short in terms of addressing issues of monitoring effectiveness. For community

based programs which have diverse governance structures, there needs to be some system of accreditation to ensure quality across programs.

Higher education addresses accountability in a many ways, but formally through the six regional accreditation agencies which are members of the Council on Postsecondary Accreditation (COPA) (see Bragg & Harmon, 1992; Bogue & Saunders, 1992). Outcomes assessment is required to some extent by all six agencies (Marchese, 1990) and by 1988 the accrediting associations "required evidence of achievement as a part of other institutional or programmatic reviews" (p. 371). Regional approaches vary, but several accreditation agencies (North Central, Southern, and Western) use an effectiveness indicator-based approach that reflects the institution's mission statement (Bragg & Harmon, 1992).

In their book, Evidence for Quality, Bogue and Saunders, (1992) review six basic practices which reflect an attempt to offer quality programs in higher education:

- accreditation: the test of goal achievement and improvement
- rankings and ratings: the test of reputation
- outcomes: the test of results
- licensure: the test of professional standards
- program reviews: the test of peer review
- follow-up studies: the test of client satisfaction (p. 22).

The vastness of programs in higher education and the variety of public and private funding sources make it difficult for higher education to approach accountability as a whole. Accreditation and professional standards are longstanding efforts to address accountability issues in higher education and can be used as models for other areas of education. But the collection of data to determine the outcomes and approaching accountability systematically are shortcomings of higher education.

Although states have been developing standards for K-12 for years, a federal approach to accountability is being undertaken by the National Council on Education Standards and Testing. In a report from the National Council (1992), it concludes that national standards should be tied to assessment so that resources can be better targeted and higher expectations for students can be created. According to the Council, "student standards include specification of the content--what students should know and be able to do--and the level of performance that students are expected to attain" (p.3). Further, the Council advocates the development of delivery standards and system performance standards so that students are not solely responsible for attaining standards. Characteristics of standards, according to the Council, should:

- reflect high expectations, not minimal levels of competency
- provide focus and direction, not become a national curriculum
- be national, not federal
- be voluntary, not mandated by federal government
- be dynamic, not static (p. 3)

In order to determine if standards have been met, new assessments and assessment systems must be developed which are: (1) individualized, (2) large scale, (3) representative of multiple methods for measuring progress, (4) voluntary and 5) developmental. Finally, the Council promotes the use of assessment as the "basis for system accountability" (p.4).

Primary concerns of the Councils' approach is an overreliance on assessment. While the Council acknowledges that new systems of assessment must be developed, it does not give enough credence to the technical assistance and professional development that is required to develop those systems. Further, the Council pays little attention to the data collection that is required to develop accountability systems and the research needed to establish standards. The National Association of Bilingual Education (NABE) and Teachers of English to Speakers of Other Languages (TESOL) have worked on standards for bilingual education for K-12 programs. NABE standards are designed to provide guidelines for teacher preparation programs and cover areas of: 1)institutional resources, coordination and commitment; 2) recruitment, advisement and retention of potential teachers; 3) bilingual/multicultural course work and curriculum; 4) language proficiency in English and non-English and ability to teach in those languages; 5) field work and practical experiences in bilingual/multicultural classrooms; and 6) lifelong learning, commitment to professional involvement (National Clearinghouse of Bilingual Education (NCBE), 1993). TESOL standards consider the improvement and effectiveness of educational programs for language minority students in public schools. TESOL's

document includes fifteen items that are grouped in four categories related to access issues such as access to a positive learning environment, access to appropriate curriculum, access to full delivery of services, and access to equitable assessment (NCBE, 1993). Unfortunately, NABE and TESOL do not significantly address the systemic aspects of implementing these standards.

Accountability: State Of The Art For Adult Education

For adult basic education (ABE) specifically, accountability frameworks were reviewed by Pelavin and Associates as they prepared to help the federal government respond to its obligations required by the National Literacy Act in establishing a model for quality indicators. In one report, Condelli, Koloski, and Webb (1992) review the states' efforts to conceptualize and measure program quality. The report indicates that states have five general areas and measures of program quality that are commonly found in the monitoring instruments. These areas include: planning (process, goals, and relationship to program components), personnel characteristics, program capacity (type of programming, instructional and other service providers, sites, and program management), curriculum/instructional methodology, and services to the disadvantaged.

Pelavin and Associates used this information along with the USDOE's request to add indicators for program, process and content, and the requirement of the National Literacy Act to establish quality indicators for recruitment, retention and learning gains.

Thus, the federal government's contribution to help states develop models for judging the success of programs includes general quality indicators related to: education gains, program planning, curriculum and instruction, staff development, support services, recruitment and retention (Office of Vocational and Adult Education (OVAE), 1992).

In another document written to help states develop evaluation frameworks for state adult education programs, Sherman and Condelli (1991) provide guidelines for establishing performance standards to use in program evaluation. They recommend that "The state must first select which indicators it wants to use as standards, obtain baseline data for the indicators and then establish a goal level for each indicator." (p.4). In addition, the authors suggest that local providers be included in developing the standards and that the state establish an ongoing process for determining how well the programs are meeting the standards.

Seven program providers suggest additional elements for establishing quality for adult education programs in a series of papers related to issues inherent in implementing quality indicators (see Corley, et al., 1992). Williams, one of the authors, discusses the importance of focusing on results and having outcomes as an important criterion for measuring successes. In the same report, Mansoor, who specifically addresses quality and ESL, offers that quality is intrinsically related to the issue of accountability and therefore systems must attend to planning; defining success in terms of the program and the learner; meeting self-defined standards; being responsive to learner needs; and linking evaluation results to program improvement, learner progress and performance. Finally,

Corley, of the Maryland State Department of Education, responds to the government's indicators of quality, by adding that it is vital to show that minimum standards are met before quality can be established.

At a forum sponsored by the National Center on Adult Literacy in June, 1993, in Washington, D.C., another practitioner, Jo Ann Weinberger suggests six recommendations for developing standards for literacy programs:

1. A process of inclusion is needed for developing the indicators.
2. Different types of standards are needed for different types of programs.
3. There is a need to determine the most important outcomes and utilize research to show how to best reach those outcomes.
4. Different types of student assessments must be utilized.
5. Professional development is crucial for successful implementation of standards.
6. More funds are needed to support the implementation of an effort to achieve standards.

For adult ESL programs, Guth and Wrigley (1992) conducted a two year study to "identify effective and innovative instructional approaches, methods, and technologies used to provide literacy instruction for adult English as a second language literacy students" (p.1). They reviewed ten programs in depth which had been selected from 123 nominations on the basis of the promising practices existent in the program. Using a combination of field research, case study and interviews, Wrigley and Guth identified

eight components of quality programs. They are: 1) community outreach, 2) needs assessment of the learner community, 3) program design, 4) curriculum, approaches and methods, 5) initial assessment and progress evaluation, 6) staff development, and 7) support services. In another publication related to their study, Wrigley and Guth (1992) conclude that since ESL programs are diverse in focus and try to accomplish a variety of goals, establishing standards might require emphasis on processes that ensure quality and programs should be held accountable for having structures, plans and evaluation tools that promote quality education. Thus, to move the ESL field toward accountability, program standards need to be developed for each of these components.

In reviewing accountability schema for various educational programs and the literature regarding quality characteristics for adult education, there appears to be five core components of demonstrating accountability. Each component is described below plus critical elements inherent in each component.

CORE COMPONENT 1. Quality program indicators should be apparent for every program.

Critical Element 1. Indicators should be tied to mission statements, goals and outcomes. Critical Element 2. The quality indicators should address the general areas of: recruitment, assessment (including needs), program planning and design, retention, curriculum and instruction, program evaluation, staff development, support services and learning progress, gains and proficiency.

CORE COMPONENT 2. **Projected program, process and learner outcomes should be established.**

Critical Element 1. Program outcomes should include recruitment, retention, curriculum and instruction, staff development and support services. Process outcomes should include assessment, program planning and design, program evaluation. Learning outcomes should include, learning progress, gains, and proficiency.

Critical Element 2. Several outcome areas will naturally overlap, but key areas must be linked. For example, assessment must be tied to curriculum and instruction, program planning should be based on needs assessment and program evaluation, staff development should reflect content of curriculum and instruction.

Critical Element 3. Diversity of program participants must be reflected in outcomes. A "one size fits all" outcome, such as "participants will complete their GED," is not appropriate for all adult ESL students.

CORE COMPONENT 3. **Outcomes must be defined with a standard of measurement.**

Critical Element 1. Standards should provide a gauge for measuring success so that there is a distinct idea of what is an acceptable level of achievement for that

standard. For example, a common learner outcome in ESL programs is "to learn English." This outcome is difficult to measure. The outcome must be more specific and must include some standard of achievement. An example of a vocational ESL standard might be "to develop proficiency in English and data entry in order to obtain employment (defined outcome) by accomplishing the objectives of an individualized instructional plan (standard of measurement)."

Critical Element 2. Assessment tools should be compatible with the type of standard that is set. For instance, if the standard is "participants will be able to complete a job interview proficiently in English," then it is not appropriate to use the BEST test as a measure of this standard because it does not test for proficiency in job interviews, for example.

CORE COMPONENT 4. **There must be a system for developing the indicators, outcomes and standards and it must be based on research, experimentation and trial and error.**

Critical Element 1. Data and information must be collected that back up the system so that it is reasonable, realistic, valid and reliable.

Critical Element 2. The system must be developed from the top down and bottom up and must have support and resources from both directions.

Critical Element 3. Specific data for ESL populations needs to be collected.

Critical Element 4. Evaluation and planning should be an integral part of the system.

CORE COMPONENT 5. A system of program monitoring and compliance and a policy regarding what will happen if the program cannot demonstrate accountability, needs to be in place.

Critical Element 1. Accreditation systems for programs which have demonstrated accountability need to be a part of the system.

Critical Element 2. Sanctions against programs that cannot demonstrate accountability and have been given adequate assistance and resources to do so, must be part of the system as well.

Accountability: The Federal and State Response

It is not surprising that leaders, administrators and instructors of adult education have not gotten very far on establishing comprehensive models of accountability as described above because they are not in agreement about what should be the goals and outcomes of adult ESL, how it should be measured, and what importance should be placed on adult ESL programs in particular. Further, programs are so diverse, it seems like an overwhelming task to establish appropriate, feasible outcomes that are based on standards which can be measured. But even if more emphasis were placed on ESL in adult education or if there were a simple way to deal with the diversity, the topic of accountability would not be any farther developed than it is now. The reality is that no one in a leadership position is currently addressing the issue of accountability in a way that will make programs truly accountable for their actions, accomplishments and expenditure of funds. The federal government and some states are getting there, but no one really has clear vision of what needs to be done.

In 1991, with the passage of the National Literacy Act, came an opportunity to begin to establish systems of accountability for adult education, in general. Legislation was adopted that provided momentum for making improvements in adult education and making programs address some issues that are vital to demonstrating accountability. The National Literacy Act contains provisions that would enable the field to lay the necessary groundwork for a substantive program of accountability. The Act:

1) opens adult education funds to all service providers;

2) increases teacher training funding allowances;

3) requires states to develop indicators of program quality to be used to evaluate programs funded through AEA (section 322,(c) (2); "to set forth measurable goals for improving literacy levels, retention in literacy programs and long term learning gains of individuals"(section 342, subsection (c) (2); to evaluate 20% of the grant recipients each year to determine the extent that the program has met the state's indicators for program quality;

4) requires that the Secretary develop indicators of program quality to be used to judge success of programs in recruitment, retention and literacy skills of students;

5) establishes an institute for literacy for conducting research, providing technical assistance and training, developing policy recommendations, developing quality indicators, and developing standards for program effectiveness;

6) establishes literacy resource centers to help providers meet quality standards by improving programs, coordinating efforts and increasing the expertise of the field.

While the legislation never mandates that the federal government or the state governments should initiate systems of accountability, it does have language that suggests

that programs 1) improve quality, 2) establish indicators of what that quality is, 3) identify standards for ensuring that quality has been met, 4) state measurable goals and 5) identify what constitutes success.

In July of 1992, the federal government offered its response to the legislation regarding the Secretary's requirement to develop indicators that can be used as models for the states in the document Model Indicators of Program Quality for Adult Education. Similarly, in July of 1993, the states submitted their required indicators that were approved by the U.S. Department of Education Office of Vocational and Adult Education. Using the above outline of core components and critical elements of accountability systems for adult ESL education, a comparison of what was adopted by both the federal government and the states to meet the requirements of the National Literacy Act legislation will help to determine what work still needs to be done to develop and ensure accountable programs. For the purposes of this paper, the five states that have the largest ESL populations are reviewed. They are: California, Texas, New York, Florida, Illinois. In addition, Massachusetts is examined because it has a significant number of ESL students and has included some unique features that warrant review.

Core Component 1: Quality Program Indicators that a) are tied to mission statements, goals and outcomes; and b) address recruitment; assessment; needs; planning and design;

retention; curriculum and instruction; evaluation; staff development; support services; learning progress, gains and proficiency.

In general, the federal government has taken a definitional approach to accountability, by describing what quality is and giving examples to illustrate the descriptions. It defines a quality indicator as "a variable that reflects effective and efficient program performance" (OVAE, 1992). Eight indicators covering program areas such as learner progress, program planning, curriculum and instruction, staff development, support services, recruitment, and retention are identified. While the indicators proposed are often broad e.g. "students remain in the program long enough to meet their educational needs;" (p.8) and sometimes vague, e.g. "learners demonstrate progress toward attainment of basic skills and competencies that support their educational needs;" (p.5), they cover the areas that current research holds to be essential for quality programs. In addition, each indicator is defined, to give the reader an idea of what is intended.

Indicators seem to be tied to the goals of adult education, although there is little specificity related to ESL instruction. Three indicators are related to outcomes, but they are very generally stated.

Two vital areas that are not included in the federal government's indicators are assessment and evaluation. Evaluation is mentioned in one indicator, but not given

ample attention to support a comprehensive accountability system. Assessment is not identified as an indicator of quality.

The states, as expected, have their own variations of the indicators of quality, but for the most part, have used the federal model as a basis. An exception is California, who had begun the work to establish indicators prior to the legislation.

California's indicators are published in the document, English-as-a-Second Language Model Standards for Adult Education Programs (1992), and strongly emphasize the instructional aspects of program development. The work of California largely focuses on standardizing levels of achievement for adult ESL instruction. The intent of California's standards is to "help administrators and instructors organize ESL classes in an articulated sequence from ESL beginning literacy through advanced; assess and place students in appropriate levels of instruction; choose textbooks and teaching techniques; and evaluate the effectiveness of curricula and programs" (California Department Of Education (CDOE), 1992). Subsequently, California primarily addresses areas of program, curriculum, instruction, and student evaluation.

Program standards include such items as sequencing courses, having a curriculum with learning objectives, and using multiple assessment measures for placement and promotion. Curriculum standards include focusing curriculum on meeting needs, having integrated instruction, and designing curriculum appropriately according to level. Instructional standards cover areas of holistic language instruction, communicative competence, language acquisition and development, and instructional sequence and

activities. Student evaluation standards are tied to placement, monitoring progress and assessing proficiency.

While progressive in three areas, California's standards seem to be narrowly focused on instructional design. They omit crucial categories such as staff development, recruitment, retention, support services and program evaluation. In addition, there is little indication of linking standards to program outcomes, but significant detail about how the standards should be implemented. Thus, California's framework suggests that quality is based on the process of instruction and assessment. Although somewhat incomplete, California's standards reflect the goals of adult education, and it is one of the few states that has focused specifically on the adult ESL population.

Indicators of program quality for Texas are modeled after the federal government's work, but expand the areas significantly (Texas Education Agency (TEA), 1993). A total of twenty-two indicators covering program planning, recruitment, curriculum and instruction, support services, professional development, and student retention are specified in the document. The indicators on learner outcomes are related to academic development, real world applications, preparation for transition, work force development, and personal development. Indicators in the program planning area include needs assessment and participatory, evaluation-based planning. Recruitment indicators consist of identifying needs and selecting appropriate strategies. Basing curriculum and instruction on adult learning theory, learner-centered and participatory approaches, functional contexts, and thinking and problem solving processes are outlined as important

indicators of quality as well as ensuring that curriculum changes according to evaluation information. Holistic assessment is identified as another indicator in quality programs. Support service indicators include matching services to needs, enabling students to access services, and working with the community to ensure full delivery of service. Professional development requires that collaborative planning is based on instructional proficiencies, needs and outcomes and emphasizes that staff development resources should be available to implement plans. The indicator on retention suggests that students should remain in the program to meet goals or make a successful transition to other educational programs.

The Texas document clearly defines what each indicator means using a format that identifies the indicator followed by "this means that" statements which depict practical applications of the indicator. Overall, Texas does a thorough job of covering indicators that are representative of quality programs and the indicators are strongly tied to goals and outcomes. Knowing that developing quality indicators must be done with care and the appropriate involvement of representative groups, New York (State Education Department/The University of the State of New York (SED/USONY), 1993) opted to develop an interim set of three indicators in Phase I. A process for developing a comprehensive set of indicators under the guidance of a working group and a reaction group is part of Phase II. The New York plan also has a pilot test component, whereby providers will work with the indicators before the indicators become part of the system.

New York's interim indicators for Phase I cover three areas: recruitment,

retention, and educational gains. The indicators are very broadly stated and allow for a great deal of flexibility. For example, indicator 3 states: "The program enables participants to demonstrate progress toward their goals." (SED/USONY, 1993, no page numbers given). The New York indicators generally relate to the goals of adult education, but are admittedly incomplete, and do not cover all areas that are cited to reflect quality in adult ESL education. Like most other states, they do not describe outcomes that should be achieved in the adult education programs.

Florida has developed nine indicators of program quality that include: educational gains and outcomes, retention, recruitment, program orientation, program planning and evaluation, curriculum and instruction, support services, and staff development (Florida Department of Education (FDOE), 1993). The wording of Florida's indicators is almost identical to USDOE's with the exception of the indicator on retention, which is worded slightly differently to reflect that retention involves students entering, exiting and reentering programs as goals change. In addition, Florida has added an indicator on program orientation that addresses commitment to serving adults who need basic and functional literacy skills so they can contribute to the community. As with the federal indicators, there is a general indication of outcomes but program evaluation and assessment are not addressed. There is no definition of the indicators or other information to describe any processes associated with the indicators; they are merely inserted in the state plan as amendments.

Illinois adds the indicators of program coordination and institutional support to a framework which mirrors the USDOE model (Illinois State Board of Education (ISBE), 1993). Wording is changed occasionally, but overall, the Illinois document closely resembles the model indicators of the federal government, and consequently, has the same problems. Two very important indicators are added: (1) provide direction for avoiding duplication of services to maximize resources and (2) ensure that program administration commits resources to meet quality requirements.

Massachusetts has taken a unique approach to the development of its indicators (The Commonwealth of Massachusetts Department of Education (CMDOE), 1993). Its approach represents a shared responsibility for quality indicators between the state and local providers. Massachusetts indicators address six areas: state leadership, coordination, and accountability; program planning and community linkages; program and staff development; curriculum and instruction; development and implementation; adult learner participation; adult learner progress, achievement, and empowerment. Within each general indicator area there are several indicators, totaling twenty.

The content of the Massachusetts' indicators is very different from the federal indicators. For state leadership, coordination and accountability, the first indicator is a mission-type statement, e.g. "...(ABE) services are an integral component of our state's strategies to support and strengthen our Commonwealth's families, communities and economy" (CMDOE, 1993, p.1). Three other indicators in this area are directed toward state officials: (1) being responsible for establishing coordinated services that are

accountable; (2) conducting planning that is ongoing, participatory, guided by evaluation, and based on regional needs and resources; (3) and ensuring that state level staff members are knowledgeable about ABE programs and can support them with appropriate technical assistance.

Indicators for program planning and community linkages cover areas related to: participatory planning based on evaluation information, needs and resources at all levels; adequate financial management and accountability; and appropriate formative and summative evaluation. Three indicators of quality are reported for program and staff development that relate to hiring, training and experience; service delivery; and program and staff development planning and implementation. Curricular and instructional indicators cover areas associated with learner progress and gains, participatory and learner-centered practices, and learner needs, goals and skill development. The area of adult learner participation includes support services, outreach and recruitment, retention and facilities. A final specific indicator is provided on learner progress, achievement and empowerment.

Massachusetts is comprehensive in establishing indicators, but includes some confusing indicators. For example, the indicator on learner progress is quite difficult to follow:

> Improvement in the full range of skills which lead to increased learner self-esteem and empowerment, including linguistic, math, life skills, critical thinking and problem solving skills. Progress in these various areas is measured by means that

give meaningful information to adult learners and teachers. (CMSOE, 1993, p. 15.)

Another shorter indicator which is hard to interpret states that: "The program's physical facilities encourage rather than inhibit strong adult education practices." (CMSOE, 1993, p.14). Massachusetts indicators, however, cover important areas, reflect the goals of adult education, and are tied to outcomes.

Core Component 2: Program, process and learner outcomes should be established and linked where appropriate; outcomes should reflect diversity of populations served.

The USDOE indicators include all three types of outcomes: program, process and learner. Quality indicators that contribute to the accomplishment of program outcomes include recruiting those who are in need of services; developing curriculum and instruction geared to student learning styles and levels of student needs; implementing staff training that is based on staff needs in terms of providing quality instruction; and providing support services that are based on needs assessment. Indicators that support process outcomes include: ongoing and participatory planning that is guided by evaluation, needs assessments and resources. Learner outcomes are related to retaining students long enough to meet educational goals; learners demonstrating "progress toward attainment of basic skills and competencies that support their educational needs" (OVAE, 1992, p.5); and learners advancing in instructional programs or completing educational requirements so they can continue in educational programs or training. To some

extent, the indicators proposed by the USDOE are linked in key areas such as gearing instruction, recruitment, and retention efforts to needs and basing planning on evaluation results. There is little indication, however, of important connections like designing curriculum and instruction to achieve learner outcomes or ensuring that assessment is tied to instruction.

Because the quality indicators of the federal government are so general, it is possible to infer that there is some sensitivity to diversity. In addition, the description of the curriculum and instruction indicator provides clarification that there should be individualization in curriculum and instruction to meet the needs of various diverse populations. Nonetheless, this elaboration does not provide substantive direction regarding quality instruction for diverse populations; it is merely a recognition that individualization should exist.

California has developed program and process outcomes, which are called standards, for ESL specifically. The outcomes are highly integrated and include extensive detail on how the curriculum should be developed, how instruction should be sequenced and designed, how assessment should be designed and used, and what instructional activities are appropriate. An example of an integrated program and process outcome follows: "The curriculum is focused on meeting students' needs as determined by assessments of students' language proficiencies, goals, and interests." (CDOE, 1992, p. 3). Learner outcomes are implied, but not overtly stated in the standards: for instance, "Language tasks in the classroom consist of meaningful interchanges that

enhance students' communicative competence." (CDOE, 1992, p.5). Finally, diversity in programming to meet participants' needs is reflected throughout California's document including a specific standard on providing instructional activities that integrate language and culture so students can compare American culture to their own.

Even though California has done extensive work in establishing proficiencies for ESL students, the levels of proficiency established are discrete and discourage individualization and participatory involvement of the learner. Proficiencies established for certain levels do not totally reflect the unique language acquisition circumstances of the learner. For example, California's beginning level assumes that the learner has very little proficiency in reading, writing, speaking, listening or work related functions. There are many circumstances, however, when a learner might possess more advanced proficiency in reading and listening than speaking or writing.

The Texas indicators cover outcomes for program, process, and learners; they are linked when appropriate and they reflect diversity. Specific learner outcomes exist for increasing proficiency in oral and written communication, problem-solving, and numeracy; improving capacity to participate as lifelong learners; demonstrating progress for attaining skills or credentials for accessing further education or training opportunities; demonstrating increased proficiency in academic skills related to work; and demonstrating increased proficiency in setting goals, self-assessing progress, and incorporating changes. Program outcomes are reflected in recruitment, curriculum and instruction, staff development and support service indicators. Program outcomes reveal

sensitivity to diversity, e.g. "Curricular and instructional processes reflect learner-centered and participatory approaches that are designed to meet individual learner needs." (TEA, 1993, p.4). They are also linked to other appropriate areas, e.g. "curriculum and instruction are based on learner outcomes, are consistent with and supportive of adult learning theory, and are supported by research and knowledge of effective practice." (TEA, 1993, p.4).

New York has one indicator on recruitment which could be considered a program outcome in that it states what the program should accomplish--"Recruits the population in the community in need of literacy services as approved in their application for funding." (SED/USONY, 1993, no page numbers given). The other two indicators reflect broad learner outcomes, "...participants stay in the program long enough to reach their goals," and "The program enables participants to demonstrate progress towards their goals." (SED/USONY, 1993, no page numbers given). The broadness of the indicators provides for diversity issues, but it is hard to say that New York is linking key areas at this time.

The accomplishments and shortcomings regarding this core component for Florida and Illinois are similar to the federal model and no other important distinctions are worth noting.

Massachusetts often combines program, process and learner outcomes in one indicator and covers all areas that are important to adult education. Further,

Massachusetts, links important areas together and their indicators reflect diversity. For example:

> The program has established processes and structures to ensure that curriculum and instruction provide for maximum feasible progress toward developing the skills foundation expected of a high school graduate, are empowering for adult learners and address their diverse educational and cultural backgrounds. (CMDOE, 1993, p. 11)

The Massachusetts indicators are holistic in nature, making many of the indicators very dense with information. This may account for the lack of clarity mentioned earlier.

Core Component 3: Outcomes must be defined with a standard of measurement that provides a gauge for knowing what an acceptable level of achievement is for that standard and assessment tools should be appropriately selected and used to measure the standard.

The USDOE defines performance standards:

> A performance standard defines a level of acceptable performance in terms of a specific numeric criterion. For example, a retention performance standard specifies a minimum number of hours of instruction per student. A standard may be established over time or to measure changes in performance of time. (OVAE, 1992, p. 2.)

However, performance standards are not part of the model developed by the USDOE. Sample measures are given for each quality indicator to give providers an idea of what data might be used to determine the level of performance achieved. The Department defines measures as "data used to determine the quantitative level of performance," (OVAE,1992, p. 2). Interestingly, the examples of measures provided are not always quantitative, especially for process or program type indicators. For example, program planning indicator measures suggest documentation like a planning document that specifies program goals and objectives, openness of the program to community input with evidence of advisory boards, and existence of program evaluation and a feedback system. No quantitative measures are mentioned for the program planning indicator. This is understandable because qualitative data is more appropriate for some process and program indicators. Nonetheless, it is unfortunate that the federal government's model presents a contradictory and confusing message in this regard.

Another disappointing characteristic of the federal government's model mentioned above is that indicators are so general that all programs should be able to do something to address the indicator and there is no way to tell which programs are doing an adequate or good job and which are not. For example, the federal government's first indicator on education gains is: "Learners demonstrate progress toward attainment of basic skills and competencies that support educational needs" (OVAE, 1992, p. 5). To define this indicator, or give the reader some direction of what this means, the document offers the following:

> Programs support learners' educational needs by promoting progress toward attainment of linguistic, mathematic, communication, and problem-solving competencies. Progress is demonstrated by improvement in participants' abilities to understand, speak, read and write English, perform basic computations, and function more effectively in the home, community and workplace. (OVAE, 1992, p. 5)

Overall, this is a good indicator for everyone to be able to do something about, but examples of what constitutes progress are not apparent. Sample measures are given, such as standardized test score gains, competency test score gains, teacher reports of gains, and alternative assessments. However, there is no indication of what the extent of progress should be; no indication of what is reasonable improvement; and essentially, no standard for determining the degree of quality that should exist.

Certainly most programs that receive AEA funds could easily show evidence of meeting this indicator, and may not work to improve because according to the federal government's model, the program is meeting quality standards if learners demonstrate any level of progress. Understandably, the federal government may not be willing to set forth the standards for demonstrating progress, or defining proficiency, because such actions have the tendency to be narrowly interpreted and may not allow for the flexibility that is required for local program needs. Plus, it is vital that local programs define progress and set standards because "grass roots" and "bottom up" participation in

accountability is necessary for a comprehensive system. But more specific guidance on establishing standards is appropriate, especially for adult ESL learners who come to programs with such diverse backgrounds and experiences.

Finally, beyond examples of measures, there is little discussion of assessment tools that should be used for measurement purposes. Assessment is a critical factor in determining outcomes, yet is seems to be grossly ignored in the federal government's document.

Of course the states that adhered to the USDOE model, Florida and Illinois, face the same problem, as does New York, which has only three very general indicators at this time. Florida has an additional problem as well. It provides only the nine indicators and gives no definition of the meaning of the indicators or what measures might be used to document that they exist. Illinois identifies a specific measurement tool for ESL students that will be used to measure gains, the Combined English Language Skills Assessment (CELSA) test, but does not define standards or measures.

Texas is more specific than the federal government or the other states, and has developed a qualitative system to try to establish local standards. Texas states the outcomes that should be achieved and what counts for quality programs, and statements that exemplify how to measure the outcome or indicator are provided. While the Texas document does not include standards per se, the measurement of achievement of a performance indicator happens in the context of results based monitoring. Local programs are required to verify existence of the indicators with specific data sources. As data

sources are reviewed, a qualitative measure (i.e., a benchmark) is derived for each indicator, and programs are expected to improve and demonstrate continuous progress. In the assessment of performance, local conditions are taken into account so that the assessment is site- and needs- specific. The standard is set in regard to each indicator and a determination of performance on each indicator is both qualitative and quantitative.

Texas has developed adult education instructor and administrator proficiencies, which present some standards for instructional delivery and program administration. The draft documents include specific descriptions of what proficient instructors and administrators do, but no measures or performance standards are given. These documents do provide, however, comprehensive outlines of what Texas believes quality instructors and administrators need to be able to do.

Massachusetts uses a somewhat different approach as those mentioned already by defining what the indicator looks like if it is in place, giving some idea of the measures that would be appropriate, and, in some cases, stating a standard of performance. Each indicator is followed by a description of what happens when the indicator is apparent in the program. For example, indicator 3.3 states that: "The program has established processes and structures to develop and implement an appropriate program and staff development plan." (CMDOE, 1993, p. 9). A suggested measure is, "Programs use the integrated program and staff development model developed by SABES." (CMDOE,

1993, p. 9). The standard given states that all staff members attend the SABES orientation for fifteen hours.

Generally, however, the Massachusetts model presents measures that are very process oriented and seem more like extended definitions of quality indicators. Performance standards are not given for most of the indicators, but a few standards are included for staff activities such as student-staff ratios, time usage, and training. Support services have standards for counseling and recruitment which are either process or program based such as "The program dedicates not less that 3% of total staff hours to program development activities;" (CMDOE, 1993, p.8) or "Adequate staff hours are assigned to retention activities." (CMDOE, 1993, p. 13). In the second example, adequate is not defined.

California's approach to standards relative to learner outcomes is novel. While California does not address program standards or process standards in much detail, they do describe elements of proficiency for six levels of ESL instruction. The levels indicate how instruction should be focused and illustrate what students should be able to do as a result of instruction. Exit criteria for listening, speaking, reading, writing, language functions, and language forms are listed, and consequently, provide the specificity for outcomes that is not apparent in the standards. Thus, at the end of the California ESL Advanced-High Level, a student would be able to "speak fluently in most formal and

informal conversations on practical and social topics, except when under tension or pressure" (CDOE, 1992, p. 37).

California recognizes that assessment of their standards or outcomes is not simple, therefore a guide for ESL Testing Standards is provided in its document. The format of this section identifies nine general standards for testing such as using tests that are appropriate, reliable and valid for non-native speakers; interpreting scores on the basis of proficiency levels; using tests to gain information that is helpful to students; administering tests appropriately, standardizing scores; using multiple measures and testing opportunities; using appropriate content; and testing higher order thinking skills. Specific descriptions of what the assessment tools and procedures should look like are provided as well as guidelines for good assessment practice. Perhaps due to California's discrete model, the document does not include much discussion on authentic or portfolio assessment, which is useful in determining outcomes of ESL instruction.

Overall, the California model is pioneering work for many aspects of ESL instruction, but it has shortcomings in terms of program issues such as how learners' individual progress can be measured in the system. Further, California has not addressed performance standards for all areas that contribute to quality ESL programs, such as recruitment, retention and staff development.

Core Component 4. There is a top down and bottom up system for developing the indicators; outcomes and standards are based on research, trial and error, and

experimentation so that data is collected that support the system, especially for ESL populations; and the system is evaluated and improved.

Essentially all states and the federal government tried to initiate the process of establishing accountability systems from top down and bottom up structures as legislated. When the USDOE contracted with Pelavin and Associates to help develop their indicators several tasks were completed to provide leadership to the states. The tasks included 1) reviewing what the states had already done relative to program quality; 2) reviewing what other related programs that support basic skills had done; 3) commissioning papers from experts in the field to examine issues related to program quality; 4) conducting focus sessions of representative groups in the field to obtain input on the indicators; 5) synthesizing the results of the focus sessions to develop core indicators which met criteria of consistency regarding the goals the AEA and NLA, while allowing for valid and reliable measurement, allowing for states' data collection capabilities, ability to aggregate data; 6) conducting workshops for state director's review of the indicators; and 7) revising indicators after the review (OVAE, 1992).

Some states have been more inclusive than others, and some states have taken more time working on their indicators than others. The extent of inclusiveness that was used by the states varies greatly. One state, Florida, had several meetings with only eleven task force members and the required hearings. While another state, Massachusetts, implemented a specific project, Greater Opportunities for Adult Learner Success (GOALS), involving over forty programs, 1,000 adult learners and state agency

staff (Massachusetts). Basically, all six states, except Illinois, went about the initial process of establishing indicators by appointing a representative task force, meeting throughout the year to review the indicators set forth by Washington, deliberating on the indicators that needed to be present in the state, and submitting them to the field for review at hearings. Illinois did not appoint a task force per se, but tried to get input at various meetings and discussions throughout the year. Some states had more of a collaborative effort in developing the indicators (California, Massachusetts, and Texas), but all states have indicated that their initial efforts are preliminary.

Beyond the NIL program to fund efforts to establish models of accountability for five states and to conduct an accountability academy for the states (Alabama, Hawaii, Kentucky, New York and Tennessee), it is difficult to know where the federal government is going with their efforts to establish an accountability system. In addition, it is not possible to know at this time what kind of work will be done by the states who received the NIL grants, and if it will deal with issues that affect ESL programs.

Obviously, the work of the federal government regarding quality, standards and accountability is incomplete. A publication on model indicators of program quality and performance measurement grants for five states is simply not enough to establish accountability for adult education. Furthermore, it is unclear what the next steps of the federal government will be.

State plans vary regarding their next steps in establishing accountability systems. Florida began a process for establishing standards and measures but put the project on hold until they see if the federal government will require something specific. California is working hard to gather information on appropriate assessment tools and publish the results. In addition, California is presently field testing their standards to see what is working and where there are gaps in the system.

Texas assigned sub-committees to refine specific learner outcomes and to develop instructor and administrator proficiencies. Texas is trying to build credence in both a qualitative and quantitative assessment system, but there are no specific plans to develop state standards of performance or measurement. Current indicators are being field tested through a results based monitoring system that will be used for evaluating 20% of the adult education programs annually.

New York's Phase 1 and Phase 2 process for developing the indicators is a natural and dynamic approach to develop an accountability system. During Phase 1, a volunteer group of 20% of AEA recipients are using the three indicators of retention, recruitment and learner gains in their program evaluations. New York is identifying measures for each indicator, collecting information on the measures, determining how the measures relate to program quality, and identifying ways to report the information. Some programs are also establishing outcomes for ESL as a voluntary experiment. The information gained from this pilot study will then be used to develop the statewide indicators and measures. For Phase 2 of the New York system, a working group and

reaction group will be appointed. The working group of 6 to 10 persons from the field with some expertise in performance indicators will develop a framework for the indicators, working with the agencies who participate in the 20% evaluation process. A reaction group of 15-30 individuals representative of the field will review and critique the indicators. Together they will develop a comprehensive list of indicators that will then be tested by 20% volunteer group of providers. This process continues annually until "all requirements of the 20% evaluation are complete" (SED/USONY, 1993, no page numbers).

A plan for developing program outcomes or measuring them has not been initiated yet in New York, but more than likely the state will put more emphasis on learner outcomes and they are looking toward a system which has two categories: required outcomes that must be met and programs' individualized outcomes based on local needs. Regarding ESL, New York will have some different outcomes, especially in the areas of cultural and survival skills. They are developing different assessment procedures for this population as well.

Illinois plans to develop performance standards this year with direction from the field. Local programs will be able to add their own indicators, but the actual process for developing standards has not been established yet. There is an indication that learner gains will be required as outcomes, but they have not decided how standards will be set as of yet.

Massachusetts will continue to work on their indicators throughout the year to improve them. They are trying to use research and data collection to determine what outcomes should be collected and what data can be collected on these outcomes, how to link goals to the outcomes and what is the linkage between such variables as progress and student participation. Massachusetts will try to develop a system of accountability that supports inputs and structures rather than just outcomes. Their systems will probably be "menu driven" to help deal with diversity issues, thereby allowing programs to decide on the outcomes that will be accomplished in accordance with needs. For ESL, assessment is a significant issue that must be addressed. Further, the idea of standards for ESL, when the needs and abilities are so diverse, is problematic. Consequently, Massachusetts is considering a goal based system of outcomes and standards for ESL to determine if students are making progress on their goals.

Core Component 5: A system of monitoring and compliance which includes policies regarding endorsement of accountable programs and sanctions for non-accountable ones.

The federal government and the states have not done much to ensure credibility regarding their systems of accountability and program quality. The USDOE does not address compliance issues, nor do many of the states. Even though there is a requirement for evaluating 20% of the programs that receive AEA funds, there is little indication of what will happen to those who cannot demonstrate that they have quality programs according to the indicators. Florida is in the process of deciding how they will

monitor quality and is developing a new evaluation form that reflects the indicators. Information on California was not available. Illinois does not yet have plans for including the indicators in their evaluation process. New York has no formal guidelines, but they will give technical assistance to those who need it as will Massachusetts. Massachusetts has not decided what they will do yet either, but they are looking to see if programs reflect the quality indicators in their proposals and will fund proposals on the basis of their quality. They have also talked about the possibility of some type of accreditation system, but have made no formal plans as of yet.

Texas will include the indicators in their Results Based Monitoring (RBM). RBM is "a single, integrated, comprehensive system to evaluate all programs," (TEA, 1993) which uses a state desk review of the annual performance report, application and complaints; a local study of the performance report, application, needs assessment, and student records; and site visits to verify data, review concerns; and development of a technical assistance program to ensure that program excellence indicators and compliance indicators are obtained. There is no indication of what will happen to programs that do not achieve results after receiving needed technical assistance.

Problems With The Present Approach to Accountability

The first and foremost problem of what has been done to date is that the field of adult education has not developed a system of accountability at the federal or state level. Bits and pieces of what should be in a system are present at all levels. Without question,

a lot of hard work has been done by many people dedicated to making programs accountable, and creative ideas and plans for developing systems at the state levels are in the works. The bottom line, however, is that a comprehensive system for genuinely establishing the accountability of programs has not resulted from the legislation of the National Literacy Act, and unfortunately it does not look as if the federal government or many states are very close to developing a system.

It is possible to argue that the National Literacy Act legislation was never designed to ensure that the USDOE or the states receiving funds from AEA would develop systems of accountability. In fact, the AEA legislation is written so that the only requirement for states is to establish indicators of quality that relate to recruitment, retention and improvement of literacy skills and evaluate 20% of the programs each year to "consider the success of the grant recipient in meeting the State's indicators of program quality" (section 352 (2) (D).

The Secretary is not exactly required to establish systems of accountability according to the legislation either. The AEA legislation reads, "the Secretary, in consultation with appropriate experts, educators, and administrators, shall develop indicators of program quality that may be used by State and local programs receiving assistance under this title as models by which to judge the success of such programs, including success in recruitment and retention of students and improvement in the literacy skills of students (Section 361 (c). This wording could be interpreted as a beginning

step for providing national leadership for accountability in adult education, but the work done through USDOE to meet this requirement went in a different direction.

The approach taken by the USDOE was to simply describe the content of quality broadly in eight areas, and to recommend some general measures that could be used to demonstrate evidence of quality. The Department also provided some very general technical assistance through publications regarding what some states currently do for evaluating and monitoring programs, what other educational programs serving similar populations have done to demonstrate quality, and what some experts in the field felt was necessary for defining quality indicators. The result is a document with broad quality indicators that are mostly process oriented and that simply do not have much teeth to them. A program could easily document evidence of the indicators of quality presented by the federal government and still not meet the goals of adult education in a very effective way because the model has no standards for measuring performance or outcomes of programs.

The lack of standards of performance and adequate measurements to accompany the indicators in order to verify quality is a problem that weakens the system. The concept of performance standard is defined, and an example outlined, but no direction on how to determine performance standards or what degree of measurement should be involved is provided. Requiring that programs identify indicators of quality, but not

requiring them to measure whether or not they can demonstrate quality is a flaw in the present approach.

Finally, omitting guidelines and criteria for systematically monitoring programs to determine how they have implemented the quality indicators, is problematic as well. Except for the already existing requirement that 20% of the programs will be evaluated, no real mechanism has been established to determine that states and programs did what they said they would do. In fact, the federal government graciously avoided this important component of accountability. The reasons for the shortcomings in the federal approach to accountability may not be the fault of the USDOE, however. The National Literacy Act diffuses the responsibility of establishing accountability for programs by giving different parts of the job to different entities. For example, the task of establishing the indicators is accomplished by the Secretary and the states, but the task of recommending performance measures and standards for program effectiveness is to be done by the NIL. Some crucial work has yet to be done because the Institute has gotten off to such a slow start, but the real problem is the distribution of the responsibility. The relationship and role of the Institute to the Department and the states is peripheral with little authority to govern the development of an accountability system.

As a consequence of the problems at the federal level, many states are making some of the same errors. Florida has adopted the federal system almost entirely and in fact has decided not to proceed with establishing measures and performance standards

until they see what the USDOE will do next. Illinois is in a similar boat, although they do have plans to develop standards of performance this next year.

California of course has gone beyond what any state has accomplished for ESL by establishing model standards and defining proficiency levels for second language learners. This work is critical as it provides a framework for ESL outcomes that reflects holistic instruction. California has also begun to critically look at ESL assessment issues which are crucial to appropriately measuring standards. An accountability system cannot function if the assessment tools do not accurately measure performance or outcomes. But California has only dealt with one area of what comprises quality programs, curriculum and instruction. It has not dealt with program and process outcomes related to recruitment, retention, staff development, planning and needs assessment.

Texas' list of indicators is comprehensive and reflects what good programs should look like according to the literature on quality. The state also developed a list of learner outcomes that are tied to curriculum and instruction, and have developed instructor and administrator proficiencies. Texas has developed a system for determining and monitoring the implementation of indicators, but it has not identified what is an acceptable level of performance. The RBM system of Texas appears to be a promising model for examining what programs have accomplished, but the state has not addressed compliance issues or how the model might be used for accreditation of programs.

New York's Phase I and II system of developing the indicators is a viable action research type process that could serve as a good vehicle for collecting data to establish

performance standards and field testing the system. New York's approach also is strong in terms of balancing the top down and bottom up input needed to develop an accountability system. The jury is not out on what type of standards they will come up with, however, plus their indicators are so broad that it seems anything can count as quality.

Massachusetts developed a valuable model for balancing agency and provider responsibility in the accountability process. In addition, Massachusetts considers a program's use of resources, which is not apparent in most other state's systems. Massachusetts' indicators are mostly process oriented, but they have established some standards of performance. The state is also developing a data collection system to conduct research for establishing other outcome standards which is important for the development of a valid and reliable system.

On the whole, the federal government and the states have been able to solve some pieces of the accountability puzzle, but there is still work to be done at all levels of adult ESL education. Following are some specific recommendations to help move the field forward in establishing a comprehensive system of accountability for adult ESL education.

Recommendations for Developing Accountability Systems for Adult ESL Education

Because of the diversity of adult ESL education programs, which serve language minority students who rarely enter programs with homogeneous characteristics, the task

of establishing systems of accountability is more than overwhelming. But it must be done, and it must be done carefully, thoughtfully and with adequate resources.

In order to expand on the work that has already been accomplished, four key policy areas need to be addressed: 1) legislation 2) leadership 3) research and technical assistance and 4) focus on adult ESL education. Each area is discussed below with specific policy recommendations.

Legislation

If adult ESL education programs are going to demonstrate accountability, it appears that the legislation of the National Literacy Act will have to be revisited.

- Greater specificity regarding what the federal government and states need to do in order to establish accountability for adult ESL education must be written into the legislation.
- Adequate resources to establish accountability systems must accompany the legislation. This responsibility cannot be accomplished within the present underfunded system of adult education.
- The legislation has to have clear direction on what is required for states to develop systems of accountability appropriate for adult ESL education. This means that the legislation must be more specific regarding requirements on standards, outcomes, measurements, monitoring and

compliance. It does not mean, however, that the legislation has to reflect a national testing or standards system because a "one size fits all" approach to accountability for adult ESL education is simply inappropriate and contrary to the characteristics of meeting needs of diverse learner populations. States and local decision makers must be responsible for developing their own customized accountability systems.

- The legislation should reflect an approach to accountability that supports the notion that standards, outcomes, measurements, monitoring and compliance issues can and should be negotiated from the bottom up to reflect participatory and learner-centered practice; but should also be based on core components and critical elements of comprehensive accountability systems that are supported from the top down.

Leadership

In order to demonstrate accountability for adult ESL education, there must national, state and local leadership for planning, developing and implementing appropriate systems.

- The USDOE has 50 documents that specify the state plans for quality indicators. Those plans must be carefully reviewed and critiqued to determine which states are developing systems of accountability that show promising practices and can be used for replication.

- The NIL needs to support more widespread development of accountability systems. Funding five states to develop performance measurement systems, even though they are to share their results, seems very limited. The NIL must be more inclusive and use some of its funding to establish a working group for adult ESL education that can develop a framework for approaching accountability more systematically.
- The NIL working group should have membership from at least seven states which serve the largest ESL populations, agency representatives that have a vested interest in adult ESL, local providers, adult ESL learners from representative language minorities, and adult ESL and accountability experts. The working group should be charged to thoroughly research and evaluate existing education accountability systems including what is presently happening in the states, recommend an appropriate system for adult ESL education, construct a plan for developing the system, and field test the system at state and local levels.

Research and Technical Assistance.

Funding must be provided to develop the needed research base for establishing standards of performance and appropriate measures for adult ESL education.

- A National Center for Research in Adult ESL Education needs to be established that has the following functions:

1) conduct needed research for adult ESL accountability

2) establish a data base for the development of performance standards,

3) develop appropriate assessment instruments for measuring performance standards

4) provide technical assistance in developing accountability systems for Adult ESL providers

5) disseminate results.

- States must establish programs of technical assistance to help providers develop quality standards and accountability systems, connected with resource centers, and based on models such as the Texas Results-Based Monitoring System, or the New York action research plan.

Focus on Adult ESL Education

An office of adult ESL in the USDOE must be established to look after concerns of this special population.

- Issues of language minority adult populations must be adequately addressed by the federal government. A system of accountability is a critical component of generating quality ESL programs, and such a system

cannot be fully developed until there are decision makers in the federal government who have the responsibility to see that it happens.

- Specific research and development funds need to be appropriated for this office to carry out a national agenda for adult ESL education. The United Kingdom and Australia have developed national frameworks for adult ESL accountability, and their work needs to be examined carefully for implications in the United States.

Conclusion

With dwindling federal dollars and public pressure to eliminate programs that are not effective, adult education has to show its worth. A "trust us" approach to accountability will not suffice. Product-oriented outcomes, measurement systems to determine if the outcomes are achieved, evaluation systems to make adjustments for program improvement and external monitoring systems to verify achievements must be implemented. But not at the expense of important and necessary process outcomes. There must be a balance, especially for adult ESL education.

The eleventh hour is near and it is time to get very serious about the specific achievements and outcomes of adult ESL education. It is true that programs are underfunded and more resources are needed. But it is crucial to demonstrate the return on investment that taxpayers and learners are getting for their money and effort. Adult ESL education must take on this very difficult challenge and establish a viable system of

accountability that meets the unique and diverse needs of adult learners. The challenge must be met by adult educators, or it will be taken on by others outside of the field.

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